

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION

NO. 5:24-CV-531-BO

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	UNITED STATES' MOTION TO STAY
	)	CIVIL PROCEEDINGS
BAXLEY REAL PROPERTY:	)	
	)	
REAL PROPERTY LOCATED AT 1190	)	
E. CONNECTICUT AVE., SOUTHERN	)	
PINES, NORTH CAROLINA, AS MORE	)	
PARTICULARLY DESCRIBED IN A	)	
WARRANTY DEED RECORDED IN	)	
BOOK 6017, PAGE 549-551 OF THE	)	
MOORE COUNTY RECORDS, AND	)	
BEING TITLED IN THE NAME OF	)	
RUDOLPH L. BAXLEY and	)	
CONSTANCE A. BAXLEY, TRUSTEES	)	
OF THE RUDOLPH L. BAXLEY AND	)	
CONSTANCE A. BAXLEY	)	
REVOCABLE TRUST DATED MARCH	)	
15, 2011, AND ANY AND ALL	)	
PROCEEDS FROM THE SALE OF	)	
SAID PROPERTY,	)	
	)	
Defendants.	)	

The United States of America, by and through the United States Attorney for the Eastern District of North Carolina, and pursuant to 18 U.S.C. § 981(g)(1), respectfully requests a 120-day stay of the instant civil forfeiture proceedings, up to and including August 8, 2025. Counsel for the United States attempted to consult

with counsel for Claimants, but did not receive a response prior to filing to this motion.

The United States is contemporaneously filing a supporting memorandum *ex parte*. The Government is also contemporaneously filing a proposed order.

Respectfully submitted this 10th day of April, 2025.

DANIEL P. BUBAR  
Acting United States Attorney

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*Counsel for the United States*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 10, 2025, I served a copy of the forgoing sealed motion on below-listed counsel by filing it on CM/ECF.

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*Counsel for Claimants*

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